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June 5, 2024

VIA ECF

The Honorable Maryellen Noreika  
J. Caleb Boggs Federal Building  
844 N. King Street  
Wilmington, DE 19801

**Re: *United States v. Robert Hunter Biden*, Criminal Action No. 23-61-MN**

Dear Judge Noreika:

This firm represents a coalition of local and national news media organizations (the “Press Coalition”)<sup>1</sup> that have reported on the above-captioned prosecution of Robert Hunter Biden, son of President Joseph R. Biden, Jr. Attached please find the Press Coalition’s Motion for Exemption to the Standing Order on Electronic Devices at the Trial in *United States v. Robert Hunter Biden*, 23-cr-61-MN. This Motion was filed by hand delivery on May 30, 2024, as a miscellaneous matter. At the Clerk of Court’s instruction, we are filing the Motion on this docket for Your Honor’s attention.

The Press Coalition respectfully requests that the Court address its motion on an expedited basis or at the earliest date possible as the trial is ongoing.

Respectfully submitted,

/s/ Beth Moskow-Schnoll

Beth Moskow-Schnoll (# 2900)  
Lauren P. Russell (# 6576)

cc: Clerk’s Office (press\_request@ded.uscourts.gov)

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<sup>1</sup> The coalition includes American Broadcasting Companies, Inc. d/b/a ABC News, the Associated Press, Cable News Network, Inc., CBS Broadcasting Inc. o/b/o CBS News, Dow Jones & Company, Inc., publisher of The Wall Street Journal, Gannett Co., Inc., the ultimate parent company of The News Journal and DelawareOnline.com, National Public Radio, Inc., NBCUniversal Media, LLC d/b/a NBCUniversal News Group, The New York Times Company, POLITICO LLC, and WP Company LLC d/b/a The Washington Post.